



April 28, 2023

VIA ECF

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019-6142
+1 212 506 5000
orrick.com

Franklin Monsour Jr.
E fmonsour@orrick.com
D +1 212 506 3512

Re: *National Coalition on Black Civic Participation et al. v. Wohl et al.*, No. 20-cv-8668

Dear Judge Marrero:

Pursuant to the Court's Order, dated April 21, 2023 (Dkt. No. 265), Plaintiffs and Defendants in the above-referenced action submit this joint letter setting forth a proposed timeline for pre-trial submissions in accordance with the Court's Individual Practices.

The parties propose the following schedule:

Thursday, June 15: Parties to file a joint pre-trial order, pre-trial memorandum, joint proposed *voir dire* questions, joint proposed requests to charge, and joint witness list

Thursday, June 22: Parties to file Motions *in limine* and other trial-related motions

Thursday, June 29: Parties to file Oppositions to Motions

Monday, July 3: Parties to file Replies to Oppositions

The week of July 17 or July 24: Pre-trial Conference

/s/Franklin Monsour Jr.
Franklin Monsour Jr.

Counsel for Plaintiffs

A handwritten signature in blue ink, appearing to read 'David Schwartz'.

Counsel for Defendants

CC: All counsel of record (via ECF)